

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,  
v.  
STEVEN E. SLAWSON,  
Defendant.

CRIMINAL ACTION  
No. 1:14-CR-186-RWS-JFK

**DEFENDANT'S PROPOSED LIMITING INSTRUCTIONS**

Defendant, Steven E. Slawson, by and through undersigned counsel, hereby respectfully proposes that the following limiting instructions.<sup>1</sup> Regarding evidence of Carter's, Inc. compliance policies, Defendant proposes that the following limiting instructions be provided to the jury when these policies are introduced:

THE GOVERNMENT HAS ENTERED INTO EVIDENCE  
CERTAIN CARTER'S COMPLIANCE POLICIES. THIS  
EVIDENCE HAS BEEN RECEIVED FOR A LIMITED PURPOSE.  
THE DEFENDANT WAS NOT AN EMPLOYEE OF CARTER'S  
AND DID NOT RECEIVE, REVIEW, POSSESS, OR DISCUSS AT  
ANY TIME ANY OF THESE CARTER'S COMPLIANCE  
POLICIES.

YOU MAY NOT CONSIDER THE POLICIES OR ANY  
TESTIMONY REGARDING THE POLICIES AS REFLECTIVE OF

---

<sup>1</sup> Defendant reserves the right to request limiting instructions regarding other evidence as necessary during the course of trial.

THE APPLICABLE LEGAL STANDARD. INDEED, THESE COMPLIANCE POLICIES DO NOT DEFINE THE LEGAL STANDARD REGARDING INSIDER TRADING. I AM RESPONSIBLE FOR INSTRUCTING YOU AS TO THE LAW THAT GOVERNS THIS CASE. YOU MUST EXCLUSIVELY RELY ON MY INSTRUCTIONS AS TO THE RELEVANT LAW.

For the transcript of Defendant's 2007 testimony in a prior unrelated civil proceeding, Defendant proposes the following limiting instruction be provided to the jury at the time the transcript is introduced:

DEPOSITIONS IN CIVIL CASES ARE FAIRLY COMMONPLACE IN TODAY'S SOCIETY, PARTICULARLY IN THE BUSINESS WORLD. IN THIS CASE THE GOVERNMENT HAS ADMITTED INTO EVIDENCE AN EXCERPT OF THE CIVIL DEPOSITION TESTIMONY OF MR. SLAWSON WHEN HE APPEARED AS A WITNESS SEVERAL YEARS AGO IN AN UNRELATED CIVIL PROCEEDING. YOU ARE INSTRUCTED TO CONSIDER THE CIVIL DEPOSITION TESTIMONY ONLY FOR THE CONTENT OF WHAT HE SAID, AND NOT TO DRAW ANY INFERENCES FROM THE FACT THAT MR. SLAWSON APPEARED AS A WITNESS IN THAT UNRELATED CIVIL PROCEEDING.

Dated: July 30, 2015

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

By: /s/ Todd Harrison  
Todd Harrison (*pro hac vice*)  
340 Madison Avenue  
New York, New York 10173  
Tel: (212) 547-5727  
Fax: (212) 547-5444  
TDHarrison@mwe.com

ROGERS & HARDIN LLP

By: /s/ Stephen D. Councill

Stephen D. Councill  
Georgia Bar No. 190358  
2700 International Tower  
229 Peachtree Street NE  
Atlanta, Georgia 30303  
Tel: (404) 522-4700  
Fax: (404) 525-2224  
scouncill@rh-law.com

*Attorneys for Defendant Steven E. Slawson*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,  
v.  
STEVEN E. SLAWSON,  
Defendant.

CRIMINAL ACTION  
No. 1:14-CR-186-RWS-JFK

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30<sup>th</sup> day of July, 2015, the foregoing DEFENDANT'S PROPOSED LIMITING INSTRUCTIONS was electronically filed with the Clerk of the Court using the CM/ECF system which will automatically send e-mail notification of such filing to the attorneys of record.

Dated: July 30, 2015

/s/ Stephen D. Councill  
Stephen D. Councill  
Georgia Bar No. 190358

ROGERS & HARDIN LLP  
2700 International Tower  
229 Peachtree Street NE  
Atlanta, Georgia 30303  
Tel: (404) 522-4700  
Fax: (404) 525-2224  
[scouncil@rh-law.com](mailto:scouncil@rh-law.com)

*Attorneys for Defendant Steven E. Slawson*